

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10294 DPW

MICHELLE TREBITSCH, On Behalf Of  
Herself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10307 DPW

INFORMATION DYNAMICS, LLC, On  
Behalf of Itself and All Others Similarly  
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10308 DPW

**[Additional Captions Follow on Next Page]**

**MOTION TO ADMIT COUNSEL PRO HAC VICE**

PETER KALTMAN, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RUBEN  
GRUBER, HASSAN AHMED and  
STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10309 DPW

SAMANTHA DEN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10310 DPW

RICHARD CURTIS, Individually And on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10314 MLW

**[Additional Captions Follow on Next Page]**

RONALD KASSOVER, on Behalf of the  
Ronald Kassover IRA and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10329 DPW

STEVE L. BAKER, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10333 DPW

MICHAEL KAFFEE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10345 DPW

**[Additional Captions Follow on Next Page]**

HAIMING HU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-10346 DPW

CHARLES STARBUCK, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10362 DPW

SAMUEL HO, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10363 DPW

**[Additional Captions Follow on Next Page]**

JEFFREY C. RODRIGUES, Individually  
and On Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

ROBERT CONTE and MARK RESPLER,  
Themselves and On Behalf of All Others  
Similarly Situating,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10382 DPW

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K PROFIT SHARING  
PLAN, On Behalf of Itself and All Others  
Similarly Situating,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10383 DPW

**[Additional Captions Follow on Next Page]**

BRIAN CLARK, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10454 DPW

SHEILA BROWNELL, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV- 10597 DPW

SAVERIO PUGLIESE, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

**[Additional Captions Follow on Next Page]**

SAVERIO PUGLIESE, On Behalf of	:	Civil Action No. 04-CV-10612-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
	:	

Pursuant to Local Rule 83.5.3, the undersigned counsel, Michael T. Matraia, hereby moves that this Court enter an Order granting leave to Richard A. Speirs of the law firm Zwerling Shachter & Zwerling, LLP to appear on behalf of plaintiff Saverio Pugliese and practice before this Court in the above-entitled civil action.

As grounds for this motion, the undersigned represents the following:

1. Richard A. Speirs is admitted to the bar of the State of New York (1986), the United States District Court of the Southern District of New York (1987), the United States District Court for the Eastern District of New York (1987), and the United States Court of Appeals for the Tenth Circuit (1997).
2. There are no disciplinary proceedings pending against Richard A. Speirs as a member of the bar in any jurisdiction.
3. Richard A. Speirs has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. Richard A. Speirs has submitted herewith his Certification For Admission Pro Hac Vice as required by Local Rule 83.5.3. See Exhibit A.

Dated: April 30, 2004

**BERMAN DEVALERIO PEASE TABACCO  
BURT & PUCILLO**

/s/ Michael T. Matraia  
Jeffrey C. Block, BBO # 600747  
Michael T. Matraia, BBO # 633049  
Nicole R. Starr, BBO #654848  
One Liberty Square  
Boston, Massachusetts 02109  
(617) 542-8300

**ZWERLING, SCHACHTER & ZWERLING,  
LLP**

Richard A. Speirs  
Kevin M. McGee  
845 Third Avenue  
New York, NY 10022  
Phone: (212) 223-3900  
Fax: (212) 371-5969

**RULE 7.1 CERTIFICATION**

Plaintiffs informed defendants of the filing of this motion. Counsel for defendants have not notified plaintiffs that they object to the relief sought in the motion.

/s/ Michael T. Matraia  
Michael T. Matraia

Sonus/dp/prohacmotion\_Speirs